

CALFRESH (CF) PROGRAM

REQUEST FOR POLICY/REGULATION INTERPRETATION

INSTRUCTIONS: Complete Items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Be sure to identify the additional discussion with the appropriate number and heading. Retain a copy of the CF 24 for your records.

- Questions from counties, including county Quality Control, must be submitted by the county CalFresh Coordinator and may be submitted directly to the CalFresh Policy analyst assigned responsibility for the county, with a copy directed to the appropriate CalFresh Policy unit manager.
- Questions from Administrative Law Judges may be submitted directly to the CalFresh Policy analyst assigned responsibility to the county where the hearing took place, with a copy of the form directed to the appropriate CalFresh Bureau unit manager.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Fair Hearing <input type="checkbox"/> Other:		5. DATE OF REQUEST: 06/02/2016	NEED RESPONSE BY: 07/01/2016
2. REQUESTOR NAME: Alli Muller		6. COUNTY/ORGANIZATION: Napa County	
3. PHONE NO.: 707-253-6180		7. SUBJECT: Authorized Representative access to CalFresh EBT Card	
4. REGULATION CITE(S): MPP 63-402.6		8. REFERENCES: (Include ACL/ACIN, court cases, etc. in references) NOTE: All requests must have a regulation cite(s) and/or a reference(s). CDSS CalFresh Manual of Policies & Procedures; EBT Manual 16-005 (a)(d)	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

1: Can authorized representatives (AR) pick up EBT cards for customers? At times ARs need to pick up EBT cards for customers who cannot come into the office and cannot wait for the cards to arrive by mail. In these situations, the cards are in the customer's name only, not the AR's name.

2: In the time of food stamps/coupons, there was an ID card that was issued to customers that could include the AR's name. With EBT, customers no longer receive ID cards, so the AR's name would not be listed on the ID card as the regulations note. Is there any other requirement for ARs to be able to pick up (not use) EBT cards for customers?

10. REQUESTOR'S PROPOSED ANSWER:

1: Yes, authorized representatives are permitted to pick up an EBT card in the customer's name and deliver it to the customer. Should the AR need to use an EBT card to purchase food for the customer, he or she should become a designated alternate cardholder and receive an EBT with his or her own name on it.

2: No, an additional ID document is not required in order for ARs to pick up EBT cards for customers.

(regulation citations are on the second page)

11. STATE POLICY RESPONSE (CFPB USE ONLY):

MPP Section 63-402.612 (a) an authorized representative (AR) may be designated to obtain benefits. These designations shall be made at the time the application is completed and/or at recertification. (b) even if a household member is able to make application and obtain benefits, the household should be encouraged to name an AR for obtaining benefits in case of illness or other circumstances which might result in an inability to obtain benefits.

Regulations regarding ID cards are no longer valid regulations because paper coupons are no longer used. The PIN number is now the identification with the EBT card.

FOR CDSS USE

DATE RECEIVED: June 20, 2016	DATE RESPONDED TO COUNTY/ALJ: June 30, 2016 RA
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CALFRESH (CF) PROGRAM REQUEST FOR POLICY/REGULATION INTERPRETATION (Continued)

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MPP 63-402.612 says "an AR may be designated to obtain benefits..." and households are encouraged to name ARs
(a) The authorized representative for coupon issuance may be the same individual designated to make application for the household or may be another individual.
(b) Even if a household member is able to make application and obtain benefits, the household should be encouraged to name an authorized representative for obtaining benefits in case of illness or other circumstances which might result in an inability to obtain benefits."

Even if the customer did not select an AR in advance, one can be selected in an emergency situation per 63-402.614.

.614 Emergency authorized representative for obtaining benefits.

A household shall be permitted to designate an emergency authorized representative to obtain the household's allotment for a particular month when none of the persons specified on the ID card is available. Alli's note: I see this as when we don't have a named AR on file before the emergency (as suggested in the section pasted above).

(a) A household member named on the ID card shall designate the emergency authorized representative. The designation authorizing the issuance of the household's benefits to the emergency authorized representative shall include the signature of the emergency authorized representative and the signature of that household member. The signature of the household member shall attest to the validity of the signature of the emergency authorized representative.

(1) The designation may be made on the ID card, authorization document or a separate form developed by the CWD for this purpose.

or

(2) A separately written and signed statement from the head of household or his/her spouse, also signed by the emergency authorized representative, may be used by the household.

(b) The household shall not be required to travel to food stamp office to execute an emergency designation.

(c) The emergency authorized representative shall present the signed designation and the household ID card in order to obtain the allotment.

(d) A separate written designation is required each time an emergency representative is authorized.